

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF SOUTH CAROLINA

CHARLESTON DIVISION

2:15-cr-472-RMG

United States of America,

vs.

Dylann Storm Roof

**EX PARTE MOTION FOR A SUBPOENA *DUCES TECUM* AND FOR THE PRE-TRIAL
PRODUCTION OF DOCUMENTS PURSUANT TO FEDERAL RULES OF CRIMINAL
PROCEDURE RULE 17(b) & 17(c)**

Comes now the Defendant through his undersigned attorneys who asks this Court to issue a subpoena *duces tecum* to the Chief of Security and Housing, Major T. Smith for the Charleston County Detention Center, to appear in the United States District Court for the District of South Carolina, Charleston Division at a time to be determined and to bring with him the following documents:

1. Charleston County Detention Center Rules for Inmates in effect as of the June 18, 2015;
2. The complete inmate file for the Defendant;
3. The Classification Interview Form signed by the Defendant.
4. Any and all forms signed by the Defendant in which he acknowledged that he had received the Charleston County Rules for Inmates;
5. Any and all documents seized from the Defendant's cell or person by personnel at the Charleston County Detention Center.
6. Any and all documents seized from the Defendant's cell or person by personnel at the Charleston County Detention Center;

7. Any and all documents, including but not limited to reports, letters, memoranda and notes which in any way refer to any documents seized from the Defendant's person or from his cell by personnel at the Charleston County Detention Center.
8. Any and all documents which will are relevant to authenticating any and all documents from the Defendant's cell.

The Defendant also asks this Court to issues its Order which requires the Chief Jailer to make copies of the above documents and provide them to his attorney within ten (10) days of service of the subpoena *duces tecum* at the Charleston County Detention Center.

The Defendant was found to be indigent at his arraignment by the Magistrate Judge. He cannot pay the witness fees and he asks this Court to exempt him from paying the same.

Respectfully Submitted,

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